

IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

NATIONAL COALITION ON BLACK CIVIC  
PARTICIPATION, MARY WINTER, GENE  
STEINBERG, NANCY HART, SARAH  
WOLFF, KAREN SLAVEN, KATE KENNEDY,  
EDA DANIEL, and ANDREA SFERES,

Plaintiffs,

-and-

People of the STATE OF NEW YORK, by its  
attorney general, LETITIA JAMES, ATTORNEY  
GENERAL OF THE STATE OF NEW YORK

Plaintiff-Intervenor,

v.

JACOB WOHL, JACK BURKMAN, J.M.  
BURKMAN & ASSOCIATES, LLC, PROJECT  
1599, and JOHN and JANE DOES 1-10,

Defendants.

Civil Action No. 20-cv-8668

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Answer to Document 297

**NOTICE OF DEFENDANTS' RESPONSE TO PLAINTIFFS MOTION *IN LIMINE* TO  
EXCLUDE EVIDENCE OF PLAINTIFFS' SETTLEMENT WITH THE MESSAGE  
DEFENDANTS AND CROSS MOTION TO ENSURE MAHANIAN'S ATTENDANCE**

For the reasons set forth in Defendants' accompanying Response and Memorandum of Law, and based on the Declaration of David Schwartz in support of Defendants' Cross Motion to ensure Mahanian's attendance, together with attached exhibits, and the record and pleadings on file in this case, Defendants respectfully ask the Court to deny Plaintiffs Motion *In Limine* concerning settlement because of the relevance of the specter of bias, and grant Defendants' request that Mahanian give witness testimony.

Dated: New York, New York

July 7, 2023

Respectfully submitted,

By: /s/ David M. Schwartz

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